

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

In re: <b>MICHAEL THOMAS KOSTELAC</b>  Debtor(s)	CASE NO. 21-61373  CHAPTER 7
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**NOTICE AND MOTION TO CONVERT FROM CHAPTER 7 TO CHAPTER 13**

COMES NOW the Debtor, Michael Thomas Kostelac, by counsel, pursuant to 11 U.S.C. § 706 and Local Rule 1017-3, and hereby moves this Honorable Court to convert this case from chapter 7 to chapter 13.

In support of said motion the Debtor further states that the reason the Debtor wishes to convert his case is: Debtor's father passed away and Debtor shall inherit from his father's estate and Debtor wishes to control the liquidation of any inherited assets.

The Debtor further states that **the above-captioned matter has not previously been converted.**

A copy of this motion is being served on the case trustee, the United States Trustee's Office, and all creditors.

Dated this 4<sup>th</sup> day of April, 2022.

/s/ Shannon T. Morgan  
Shannon T. Morgan, Attorney for Debtor

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*Counsel for the Debtor*

**IF THIS CASE HAS NOT PREVIOUSLY BEEN CONVERTED:**

**The conversion of this case will be effective on the 21st day following the date of the filing of this motion without necessity of a hearing unless timely objection to this motion is filed with the court and the objecting party schedules and notices a hearing pursuant to Local Rule 1017-3.**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 4, 2022, a true copy of the foregoing Notice and Motion to Convert from Chapter 7 to Chapter 13 was mailed, via first class postage paid, or served via the CM/ECF system, to the Chapter 7 Trustee, to the United States Trustee's Office and to all necessary creditors or parties in interest, at the addresses on the Court's Mailing Matrix.

/s/Shannon T. Morgan

Shannon T. Morgan